

Feb 21 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

CASE NUMBER: CR23-63 JSC

USA v. Kent Laird, Soyvaree Kaewdee, Jiaqi Zhang

CR

Is This Case Under Seal?

Yes ☒ No

Total Number of Defendants:

1 2-7 ☒ 8 or moreDoes this case involve ONLY charges
under 8 U.S.C. § 1325 and/or 1326?Yes No ☒

Venue (Per Crim. L.R. 18-1):

SF ☒ OAK SJ

Is this a potential high-cost case?

Yes No ☒Is any defendant charged with
a death-penalty-eligible crime?Yes No ☒

Is this a RICO Act gang case?

Yes No ☒

Assigned AUSA

(Lead Attorney): Barbara J. Valliere

Date Submitted: 2/21/2023

Comments:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

CR23-63 JSC

UNITED STATES OF AMERICA,

V.

KENT LAIRD,
SOYVAREE KAEWDEE,
and
JIAQI ZHANG,

DEFENDANT(S).

FILED

Feb 21 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

INDICTMENT

18 U.S.C. § 1349 – Conspiracy to Commit Mail Fraud;
18 U.S.C. § 1341 – Mail Fraud;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 21st day of

February, 2023.


Clerk



Bail, \$ Arrest Warrant

FILED

Feb 21 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR23-63 JSC
)	
Plaintiff,)	<u>VIOLATIONS:</u>
)	18 U.S.C. § 1349 – Conspiracy to Commit Mail
v.)	Fraud;
)	18 U.S.C. § 1341 – Mail Fraud;
KENT LAIRD,)	18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
SOYVAREE KAEWDEE,)	Forfeiture Allegation
and)	
JIAQI ZHANG,)	SAN FRANCISCO VENUE
)	
Defendants.)	

INDICTMENT

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. “Company One” is an American business and employment-oriented online service headquartered in Sunnyvale, California that operates via websites and mobile apps. The “Company One” Media Production (“LMP”) Team is responsible for execution of two categories of internal and external production: “Content Production” and “Live Production.” “Content Production” work relates to productions of internal promotional videos and includes creative development, production, and distribution of media. “Live Production” work relates to Company One’s broadcast infrastructure

INDICTMENT

1 delivering content, event, and streaming for both internal and external audiences.

2 2. Defendant KENT LAIRD resided in Redwood City, California and Bothel, Washington.
3 In November of 2017, Company One hired LAIRD as its LMP Director, Head of Content, Video &
4 Studios to manage LMP's Content Production work.

5 3. Defendant SOYVAREE KAEWDEE resided in Lawndale, California and Las Vegas,
6 Nevada.

7 4. Defendant JIAQI ZHANG resided in Redwood City, California and Bellevue,
8 Washington.

9 5. "Company Two," located in Santa Clara, California, is a company that provided audio
10 and video equipment and technical production services as well as employment processing services for
11 companies requiring event and studio production support. Employment processing services included,
12 among other things, review and processing information related to a company's independent contractors.
13 Specifically, Company 2 assisted companies with completion of Forms I-9 (Employee Eligibility
14 Verification), generation of Forms 1099, and invoice tracking. Company Two's employment processing
15 services also included onboarding and processing payments to the client companies' independent
16 contractors.

17 6. During the time alleged in this Indictment, Company One's LMP team employed
18 independent contractors and used Company Two to hire and pay the independent contractors. Company
19 Two charged Company One an hourly rate for production services and a 10 percent fee for its
20 employment processing services.

21 *The Schemes to Defraud*

22 7. From a time unknown but no later than May of 2018 and continuing through in or about
23 December 2019, defendants KENT LAIRD and SOYVAREE KAEWDEE engaged in a scheme, plan,
24 and artifice to defraud Company One and Company Two as to a material matter, and to obtain money
25 and property by means of materially false and fraudulent pretenses, representations, and promise, by
26 making materially false and misleading statements, and failing to disclose material facts with a duty to
27 disclose. From a time unknown but no later than October of 2018 and continuing through in or about
28 December 2019, defendants KENT LAIRD and JIAQI ZHANG engaged in a scheme, plan, and artifice

1 to defraud Company One and Company Two as to a material matter, and to obtain money and property
2 by means of materially false and fraudulent pretenses, representations, and promise, by making
3 materially false and misleading statements, and failing to disclose material facts with a duty to disclose.

4 8. The objectives of the schemes to defraud were, among other objectives, (a) to cause
5 Company Two to retain KAEWDEE and ZHANG as independent contractors for Company One by
6 falsely representing that they were qualified to perform consultant or producer services for LMP and
7 Company One; (b) to submit false or overstated invoices for work done by KAEWDEE and ZHANG,
8 knowing that either no work or minimal work had been done on behalf of LMP; (c) to obtain payment
9 from Company Two on behalf of Company One of thousands of dollars for services that had not been
10 performed; and (d) to provide kickbacks to LAIRD for payments made on the fraudulent invoices
11 submitted to Company Two and paid by Company Two on behalf of LMP and Company One.

12 As part of the conspiracies and the schemes to defraud:

13 9. In May of 2018, LAIRD and Company Two worked out an arrangement whereby (a)
14 LAIRD would provide Company Two with the names and employment documentation for so-called
15 “freelancers,” independent contractors that LAIRD wanted to use for Company One projects; (b)
16 Company Two would engage LAIRD’s freelancers as independent contractors of Company Two; (c) the
17 freelancers would send invoices to LAIRD at Company One for their services; (d) LAIRD would
18 approve the freelancers’ invoices and pass them on to Company Two for payment; (e) Company Two
19 would pay the freelancers; and (f) Company Two would then provide invoices to Company One for the
20 amount paid the freelancers plus its 10 percent fee.

21 10. On May 14, 2018, LAIRD contacted Company Two and identified two freelancers he
22 wanted Company Two to onboard as independent contractors. Attached to the email were Internal
23 Revenue Forms W-9 (Request for Taxpayer Information Number and Certification) signed by two
24 individuals, SOYVAREE KAEWDEE, and Unindicted Freelancer #1. LAIRD represented that he
25 wanted to hire these freelancers as “consultants” or “producers” and have them work directly for him on
26 LMP projects.

27 11. Company One’s position description for the position of “Producer – Video Production”
28 states that the person should have the following qualifications: “bachelor’s degree in film/television or

1 equivalent practical experience”; and “4+ years of professional experience in a producing role.” Among
2 the responsibilities for the producer position is to “[p]roduce a variety of projects including
3 documentary, marketing, narrative, and series,” “[g]uide projects from creative development to pre-
4 production, production, post production, and final delivery,” “[w]ork closely with writer/directors to
5 ensure the integrity of a production,” and “[m]anage organizational and logistical tasks for a production
6 including shoot scheduling, location scouting, crewing, creating call sheets, and obtaining permits and
7 releases as needed.”

8 12. On October 18, 2018, LAIRD identified JIAQI ZHANG as someone he wanted to hire as
9 a freelance producer and sent Company Two a Form W-9 signed on October 11, 2018 by ZHANG.

10 13. On February 26, 2019, KAEWDEE sent a new W-9 to LAIRD that listed a new address
11 in Las Vegas, Nevada. LAIRD forwarded the new W-9 to Company Two on March 9, 2019.

12 14. A Company One Statement of Work (SOW) provided to Company Two for January 1,
13 2019 through December 31, 2019, identified KAEWDEE and ZHANG as providing the company
14 “Freelance Producer Work” delivering “Production services,” “Video editing,” and “Script writing.”

15 15. LAIRD caused Company Two to hire KAEWDEE and ZHANG as independent
16 contractors, specifically freelance producers, despite that, among other things, KAEWDEE did not have
17 a bachelor’s degree in film or television, or possess prior professional experience in a producing role,
18 and ZHANG did not have a bachelor’s degree in film or television, or possess more than four years prior
19 professional experience in a producing role.

20 16. Beginning in June of 2018 and continuing until November of 2019, LAIRD approved
21 fraudulent invoices for work performed by KAEWDEE and ZHANG that he then forwarded to
22 Company Two for payment. Specifically, between on or about June 4, 2018 and November 25, 2019,
23 LAIRD created and then approved a total of 71 invoices submitted to Company One on behalf of
24 KAEWDEE for podcast writing or producing work done for LMP at Company One despite that
25 KAEWDEE performed no work for Company One. Between June 13, 2018 and November 25, 2019,
26 based on LAIRD’s approval of the invoices, Company Two issued 71 cashier’s checks to KAEWDEE
27 for work done for LMP at Company One in the total amount of \$537,210.49.

28 17. Between on or about October 16, 2018 and continuing until November 20, 2019, LAIRD

1 approved a total of 58 invoices ZHANG submitted to Company One for podcast writing or producing
2 work done for Company One despite that ZHANG performed little to no work for Company One.
3 Between October 16, 2018 and November 20, 2019, based on LAIRD's approval of the invoices,
4 Company Two issued 58 checks to ZHANG for work done for LMP at Company One in the total
5 amount of \$155,400.00.

6 18. Between June 18, 2018 and December 3, 2019, KAEWDEE deposited the checks she had
7 received from Company Two into three separate bank accounts: Wells Fargo Account No. xxxxxx6563,
8 opened in the name of K.K., a relative of KAEWDEE; Wells Fargo Account No. xxxxxx4508, opened
9 in the name of K.K., a relative of KAEWDEE; and Wells Fargo Account No. xxxxxx9300, opened in
10 KAEWDEE's own name. Between June 19, 2018 and November 22, 2019, KAEWDEE caused 74 wire
11 transfers from Wells Fargo Account No. xxxxxx9300 and Wells Fargo Account No. xxxxxx7764 to be
12 sent to LAIRD's Wells Fargo Account No. xxxxxx9600 for a total of amount of \$150,350.00. Between
13 July 24, 2018 and November 22, 2019, KAEWDEE caused 16 wire transfers to be made from K.K.'s
14 Wells Fargo Account No. xxxxxx6563 and Wells Fargo Account No. xxxxxx4508 to LAIRD's Wells
15 Fargo Account No. xxxxxx9600 for a total amount of \$33,700.00.

16 19. Between October 16, 2018 and November 18, 2019, ZHANG deposited 54 of the checks
17 she had received from Company into Wells Fargo Account No. xxxxxx1808. On October 7, 2019, a
18 \$25,000.00 in cashier check drawn from ZHANG's Wells Fargo account xxxxxx1808 was deposited
19 into LAIRD's Wells Fargo Account No. xxxxxx9600.

20 20. In furtherance of their schemes to defraud, KENT LAIRD, SOYVAREE KAEWDEE,
21 JIAQI ZHANG, used a variety of means and methods, including:

- 22 a. Making false statements to obtain independent contractor status for KAEWDEE and
23 ZHANG with Company Two, including making false or misleading misrepresentations
24 regarding the qualifications of KAEWDEE and ZHANG to perform the work for LMP
25 and the scope of work to be performed for LMP;
- 26 b. Submitting fabricated or inflated invoices to Company Two for work not performed on
27 behalf of Company One;
- 28 c. Obtaining payment from Company Two on behalf of LMP at Company One for services

not rendered to LMP or Company One; and

- d. Providing payment in the form of kickbacks to LAIRD for facilitating fraudulent payment of invoices for work not performed for LMP or Company One.

COUNT ONE: 18 U.S.C. § 1349 (Conspiracy to Commit Mail Fraud)

21. The factual allegations in Paragraphs 1 through 20 are re-alleged and incorporated as if fully set forth here.

22. Beginning no later than in or around May of 2018 and continuing until at least in or around November of 2019, in the Northern District of California, and elsewhere, the defendants,

KENT LAIRD, and
SOYVAREE KAEWDEE,

knowingly conspired and agreed with each other and with others known and unknown to the Grand Jury to commit mail fraud, in violation of Title 18, United States Code, Section 1341.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH TEN: 18 U.S.C. § 1341 (Mail Fraud)

23. The factual allegations in Paragraphs 1 through 20, and 22 are re-alleged and incorporated as if fully set forth here.

24. Beginning no later than May of 2018, and continuing through in or about November of 2019, in the Northern District of California, and elsewhere, the defendants,

KENT LAIRD, and
SOYVAREE KAEWDEE,

did knowingly and with the intent to defraud devise and intend to devise a scheme and artifice to defraud Company One as to a material matter, and to obtain moneys and property from Company One by means of materially false and fraudulent pretenses, representations, and promises, and by means of omission and concealment of material facts, which scheme and artifice is summarized in paragraphs 7 through 20 above.

The Use of the Mails

25. On or about the dates set forth in the separate counts below, in the Northern District of California, and elsewhere, for the purpose of executing the scheme and artifice referred to above, and attempting to do so, the defendants

KENT LAIRD, and
SOYVAREE KAEWDEE,

did knowingly cause to be delivered by the U.S. Postal Service according to the direction thereon the following mail matter containing checks drawn on Company Two's bank account:

COUNT	DATE	DESCRIPTION OF MAIL COMMUNICATION
Two	October 6, 2018	Mailing sent to KAEWDEE at an address in Lawndale, California containing CitiBank Cashier's Check No. 118302770 in the amount of \$16,400
Three	December 19, 2018	Mailing sent to KAEWDEE at an address in Lawndale, California containing CitiBank Cashier's Check No. 119836509 in the amount of \$4,400
Four	January 12, 2019	Mailing sent to KAEWDEE at an address in Lawndale, California containing CitiBank Cashier's Check No. 120364694 in the amount of \$16,500
Five	March 13, 2019	Mailing sent to KAEWDEE at an address in Las Vegas, Nevada containing CitiBank Cashier's Check No. 121588554 in the amount of \$7,000
Six	May 25, 2019	Mailing sent to KAEWDEE at an address in Las Vegas, Nevada containing CitiBank Cashier's Check No. 123051285 in the amount of \$12,000
Seven	June 22, 2019	Mailing sent to KAEWDEE at an address in Las Vegas, Nevada containing Citibank Cashier's Check No. 123618552 in the amount of \$11,000
Eight	August 16, 2019	Mailing sent to KAEWDEE at an address in Las Vegas, Nevada containing CitiBank Cashier's Check No. 124743226 in the amount of \$8,000
Nine	October 3, 2019	Mailing sent to KAEWDEE at an address in Las Vegas, Nevada containing CitiBank Cashier's Check No. 125696204 in the amount of \$15,000
Ten	November 13, 2019	Mailing sent to KAEWDEE at an address in Las Vegas, Nevada containing CitiBank Cashier's Check No. 126464074 in the amount of \$5,000

Each in violation of Title 18, United States Code, Section 1341.

COUNT ELEVEN: 18 U.S.C. § 1349 (Conspiracy to Commit Mail Fraud)

26. The factual allegations in Paragraphs 1 through 20 are re-alleged and incorporated as if fully set forth here.

27. Beginning no later than in or around October of 2018 and continuing until at least in or around November of 2019, in the Northern District of California, and elsewhere, the defendants,

KENT LAIRD, and
JIAQI ZHANG,

knowingly conspired and agreed with each other and with others known and unknown to the Grand Jury to commit mail fraud, in violation of Title 18, United States Code, Section 1341.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWELVE THROUGH TWENTY: 18 U.S.C. § 1343 (Mail Fraud)

28. The factual allegations in Paragraphs 1 through 20, and 27 are re-alleged and incorporated as if fully set forth here.

29. Beginning no later than October of 2018, and continuing through in or about November of 2019, in the Northern District of California, and elsewhere, the defendants,

KENT LAIRD, and
JIAQI ZHANG

did knowingly and with the intent to defraud devise and intend to devise a scheme and artifice to defraud Company One as to a material matter, and to obtain moneys and property from Company One by means of materially false and fraudulent pretenses, representations, and promises, and by means of omission and concealment of material facts, which scheme and artifice is summarized in paragraphs 7 through 20 above.

The Use of the Mails

30. On or about the dates set forth in the separate counts below, in the Northern District of California, and elsewhere, for the purpose of executing the scheme and artifice referred to above, and attempting to do so, the defendants

KENT LAIRD, and
JIAQI ZHANG,

did knowingly cause to be delivered by the U.S. Postal Service according to the direction thereon the following mail matter containing checks drawn on Company Two's bank account:

COUNT	DATE	DESCRIPTION OF MAIL COMMUNICATION
-------	------	-----------------------------------

Twelve	October 16, 2018	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 118478518 in the amount of \$1,300
Thirteen	February 9, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 120939925 in the amount of \$1,700
Fourteen	May 14, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 122857785 in the amount of \$2,000
Fifteen	June 8, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 123383048 in the amount of \$3,400
Sixteen	June 22, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 123622826 in the amount of \$5,100
Seventeen	August 16, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 124748614 in the amount of \$15,000
Eighteen	October 4, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 125727953 in the amount of \$15,000
Nineteen	October 26, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 126107483 in the amount of \$2,500
Twenty	November 16, 2019	Mailing sent to ZHANG at an address in Redwood City, California containing CitiBank Cashier's Check No. 126524991 in the amount of \$1,700

Each in violation of Title 18, United States Code, Section 1341.

FORFEITURE ALLEGATION: 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

31. The allegations contained in this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

32. Upon conviction for any of the offenses set forth in Counts One through Twenty of this Indictment, the defendants,

KENT LAIRD,
SOYVAREE KAEWDEE, and
JIAQI ZHANG,

INDICTMENT

1 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
 2 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting, or derived
 3 from proceeds the defendant obtained directly and indirectly, as the result of those violations, including
 4 but not limited to the following:

5 33. If any of the property described above, as a result of any act or omission of the defendant:

- 6 a. cannot be located upon exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be divided without
 11 difficulty,

12 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
 13 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

14 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code,
 15 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

16
 17 DATED: 2/21/2023

A TRUE BILL.

18 /s/ *Foreperson*

19
 20 _____
 FOREPERSON

21
 22
 23 STEPHANIE M. HINDS
 United States Attorney

24 /s/ *Barbara J. Valliere*

25 _____
 26 BARBARA J. VALLIERE
 Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S.
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 18 U.S.C. § 1349 – Conspiracy to Commit Mail Fraud;
 18 U.S.C. § 1341 – Mail Fraud;
 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: 20 years' imprisonment
 3 years' supervised release
 \$250,000 fine per felony conviction
 \$100 special assessment
 restitution, and forfeiture

 Name of District Court, and/or Judge
 NORTHERN DISTRICT OF
 SAN FRANCISCO

Feb 21 2023

 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO
DEFENDANT - U.S.
 KENT LAIRD

DISTRICT COURT NUMBER

CR23-63 JSC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.


☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form Stephanie Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Barbara J. Valliere
IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges 
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
 If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST 

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY 

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 18 U.S.C. § 1349 – Conspiracy to Commit Mail Fraud;
 18 U.S.C. § 1341 – Mail Fraud;
 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: 20 years' imprisonment
 3 years' supervised release
 \$250,000 fine per felony conviction
 \$100 special assessment
 restitution, and forfeiture

 Name of District Court, and/or Judge/Magistrate
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION
FILED
 Feb 21 2023
 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO
DEFENDANT - U.S.

SOYVAREE KAEWDEE

DISTRICT COURT NUMBER

CR23-63 JSC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. ATTORNEY ☐ DEFENSE

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☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form Stephanie Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Barbara J. Valliere

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges
-
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S.
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
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 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

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☒ Felony

 PENALTY: 20 years' imprisonment
 3 years' supervised release
 \$250,000 fine per felony conviction
 \$100 special assessment
 restitution, and forfeiture

 Name of District Court, and/or Juvenile Court
 NORTHERN DISTRICT
 SAN FRANCISCO
FILED

Feb 21 2023

 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO
DEFENDANT - U.S.

JIAQI ZHANG

DISTRICT COURT NUMBER

CR23-63 JSC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form Stephanie Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Barbara J. Valliere

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges
-
- If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: